

DAVID HAYNER; May 19, 2010

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IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION

PATTY BEALL, MATTHEW MAXWELL, )  
TALINA McELHANY and KELLY )  
HAMPTON, individually and on )  
behalf of all other similarly )  
situated, ) 2:08-cv-422 TJW

Plaintiff(s), )

vs. )

TYLER TECHNOLOGIES, INC., and )  
EDP ENTERPRISES, INC., )

Defendant(s). )

DEPOSITION UPON ORAL EXAMINATION OF  
DAVID HAYNER

2:05 P.M.

MAY 19, 2010

520 PIKE STREET, 12TH FLOOR

SEATTLE, WASHINGTON

REPORTED BY: MARY L. GREEN, CCR 2981

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1 went into fixed assets but it was really an account  
2 receivable.

3 Q. So if they input it wrong, ultimately it's not  
4 going to reconcile?

5 A. Correct.

6 Q. So sticking with this particular  
7 reconciliation -- I'm sorry -- implementation of a GASB  
8 34, anything else that would be involved in that  
9 meeting, that week meeting that you have with the  
10 client?

11 A. No. I mean, that's essentially the whole  
12 process is I show up, show them how to label, they  
13 label, I show them how to attach those labels to their  
14 GL accounts the proper way, and then they attach them,  
15 reconcile them, and when they're reconciled with their  
16 previous year's financial reports, we're done.

17 Q. Tell me how that process differs from when  
18 you're implementing the general ledger or accounts  
19 payable or the purchasing modules. I mean, you said  
20 the GASB 34 was the simplest, correct?

21 A. It's the most direct. The process is  
22 essentially the same for all of the other modules.  
23 They just tend to be a little more complex simply  
24 because if you set something up in the general ledger,  
25 it impacts what happens with -- the way that they've

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1 set it up in their general ledger impacts the way that  
2 purchasing functions, and the way that purchasing  
3 functions impacts the way that accounts payable  
4 functions, so they just get a little more complex in  
5 terms of the amount of set-up.

6 It's much more intricate, and so you really  
7 have to talk with them to get them to come up with how  
8 they want the software to work and show them how they  
9 can set it for that as opposed to GASB where it's  
10 either here or it's there.

11 It's fairly straightforward, whereas with the  
12 implementation of the other modules, a lot of times  
13 this may impact how something works over here and you  
14 may want it to work this way over here but you don't  
15 want it to work that way over there, so then you have  
16 to tell them how they may have to alter the way that  
17 they use the functionality over here if they want it to  
18 work that way, so they have to make decisions about  
19 settings.

20 Q. It's real hard when you read your transcript  
21 later. I totally see what you're saying, because  
22 you're very expressive, and it makes it a lot easier,  
23 but that doesn't come out in the transcript. Can you  
24 give me a real life example using what might be the  
25 here and the there and this and that?

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1 time period after you were in your quality assurance  
2 role and you've come back to implementation consultant.  
3 Are you working with the same modules we've been  
4 discussing?

5 A. Yes and no. I'm still working with the GASB  
6 34. I've now picked up the advanced budgeting module,  
7 and I'm attempting to learn the payroll module.

8 Q. What do you mean by attempting to learn the  
9 payroll module?

10 A. Learning the functioning of the payroll  
11 module, piece of cake. Learning all of the detail  
12 behind payroll and all of the possibilities that exist  
13 is mind boggling.

14 Q. Having no concept of those details or  
15 possibilities, can you give me some examples or explain  
16 some of it to me?

17 A. You know, FLSA law, I have no clue how to  
18 implement this because there are so many options and so  
19 many entities and nobody does it the same.

20 Q. When you say nobody, you mean no client sets  
21 their payroll up the same?

22 A. Exactly, yeah. It's all different. Knowing  
23 when I'm as new at it as I am what all of the  
24 implications are of FLSA law to how this entity or that  
25 entity sets up their fire department, that takes years

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I, MARY L. GREEN, the undersigned Certified Court Reporter and Notary Public, do hereby certify:

That the sworn testimony and/or proceedings, a transcript of which is attached, was given before me at the time and place stated therein; that any and/or all witness(es) were duly sworn to testify to the truth; that the sworn testimony and/or proceedings were by me stenographically recorded and transcribed under my supervision, to the best of my ability; that the foregoing transcript contains a full, true, and accurate record of all the sworn testimony and/or proceedings given and occurring at the time and place stated in the transcript; that I am in no way related to any party to the matter, nor to any counsel, nor do I have any financial interest in the event of the cause.

WITNESS MY HAND, SEAL, AND DIGITAL SIGNATURE this 25th day of May, 2010.

MARY L. GREEN  
Certified Court Reporter, #2981  
Notary Public in and for the State of Washington,  
Residing in Snohomish County. Commission expires 4-4-2013.  
mgreen@yomreporting.com

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